

MEMO ENDORSED



THE CITY OF NEW YORK LAW DEPARTMENT

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January 6, 2020

VIA ECF

Honorable Katherine P. Failla
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Vickers-Pearson v. City of New York et al.,
18-CV-08610 (KPF)

Your Honor:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, and the attorney for defendants City of New York and Correction Officer Brown in the above-referenced matter. I write pursuant to the Court's December 11, 2019 Order which ordered, among other things, defendants to serve defendants' Motion for Summary Judgment by January 15, 2020. (See Civil Docket Entry No. 52). In accordance with that Order, defendants respectfully request a brief sixteen-day enlargement of time from January 15, 2020 until January 31, 2020 within which defendants may serve defendants' Motion for Summary Judgment. This is defendants' first request for an extension of time to serve defendants' Motion for Summary Judgment and *pro se* plaintiff, Tonye D'Mitria Vickers-Pearson, consents to this request. The reason for this request is the unforeseen necessity to respond to a plaintiff's Motion for Summary Judgment in an unrelated case that is due on January 14, 2020. Defendants respectfully submit that a brief extension until January 31, 2020 will not unduly delay this action.

Should the Court grant the within request the parties have conferred and propose the following briefing schedule:

- Defendants' Motion due: January 31, 2020
- Plaintiff's Opposition due: March 31, 2020
- Defendants' Reply due: April 14, 2020

Defendants thank the Court for its time and consideration in this matter.

Respectfully submitted,

Stephanie De Angelis /s
Stephanie De Angelis
Assistant Corporation Counsel
Special Federal Litigation Division

BY FIRST CLASS MAIL

TO: Tonye-D'mitra Vickers-Pearson DIN: 17-R-3194
Plaintiff Pro Se
Attica Correctional Facility
639 Exchange Street
P.O. Box 149
Attica, NY 14011-149

Application GRANTED. The Court adopts the parties' proposed modified briefing schedule.

Dated: January 6, 2020
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE

A copy of this Order was mailed by Chambers to:
Tonye-D'mitra Vickers-Pearson
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DIN: 17-R-3194
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P.O. Box 149
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